

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas, Brownsville

United States Courts  
Southern District of Texas  
FILED

May 16, 2024

United States of America

v.

Hector Jesus MAYORGA  
2002Nathan Ochsner, Clerk of Court  
Case No. 1:24-MJ-291-01

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 13, 2024 in the county of Cameron in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

18 U.S.C. 922 (a)(6)

## Offense Description

On May 13, 2024, in Cameron County, Texas and within the jurisdiction of the court, Hector Jesus MAYORGA, purchased a Romarm/Century Arms, Model: Draco, 7.2x39 mm caliber rifle, Serial Number: 23PMD-49481 and a Romarms/Century Arms, Model: WASR, 7.62x39 mm caliber rifle, Serial Number: 2381-01867. MAYORGA completed an ATF FORM 4473 - Firearms Transaction Record to purchase the aforementioned rifle on behalf of an individual in Mexico.

This criminal complaint is based on these facts:

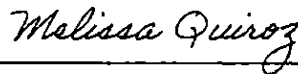
See attached affidavit.

☒ Continued on the attached sheet.*Melissa Quiroz*  
Complainant's signatureMelissa Quiroz, Special Agent ATF  
Printed name and titleComplaint authorized by AUSA L. Salazar  
Submitted by reliable electronic means,  
sworn to and attested to telephonically per  
Fed. R.Cr.P.4.1, and probable cause found on:Date: 05/16/2024City and state: Brownsville, Texas*Karen Betancourt*  
Judge's signatureKaren Betancourt, United States Magistrate Judge  
Printed name and title

## ATTACHMENT A

1:24-MJ-291-01

1. This affidavit is intended to show that there is probable cause to believe that on or about May 13, 2024, Hector Jesus MAYORGA purchased a Romarms/Century Arms, Model: Draco, 7.62x39 mm caliber rifle, Serial Number: 23PMD-49481 and a Romarms/Century Arms, Model: WASR, 7.62x39 mm caliber rifle, Serial Number: 2381-01867, in violation of Title 18 USC§ 922 (a)(6) - False statement as to material facts.
2. On May 13, 2024, MAYORGA purchased the aforementioned WASR and Draco rifles from Lone Star Guns, a Federal Firearms Licensee (FFL) in Harlingen, Texas. MAYORGA completed an ATF Form 4473 -Firearms Transaction Record. On the ATF Form 4473, MAYORGA answered "yes" to question 21.a., documenting that MAYORGA was the actual purchaser of the rifles. Upon completing this form, MAYORGA obtained the rifles from Lone Star Guns.
3. On May 15, 2024, your affiant conducted an interview of MAYORGA, the purchaser of the aforementioned rifles, who freely and voluntarily stated that he was not the actual purchaser of the rifles, and that he purchased the rifles on behalf of an individual in Mexico, only known to him as "Patino." Through the investigation, agents learned that MAYORGA purchased the firearms with his own money but was later reimbursed and compensated with a \$200.00 profit.
4. Once MAYORGA obtained the WASR and Draco rifles from Lone Star Guns, he agreed to deliver the Draco rifle to "Patino" in Mexico. MAYORGA informed agents that he handed the firearm to an unknown individual, hereafter referred to as FNU/LNU, in the United States, who then transported the Draco rifle to Mexico. MAYORGA stated he traveled to Mexico and met with FNU/LNU, who then returned the Draco rifle to MAYORGA. After the Draco rifle was returned to MAYORGA in Mexico, MAYORGA then transferred the Draco rifle to "Patino" while he was in Mexico.
5. Your affiant submits that the facts set forth in this affidavit to establish probable cause to believe that MAYORGA committed a violation of Title 18 USC § 922 (a)(6).



Special Agent Melissa J. Quiroz

Bureau of Alcohol, Tobacco, Firearms and Explosives

SUBMITTED BY RELIABLE ELECTRONIC MEANS,  
SWORN TO AND SIGNATURE ATTESTED  
AS PER FED. RULES CR. PROC. 4.1



Karen Betancourt, United States Magistrate Judge

5/16/2024

Date